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File No: 52036

**IN THE UNITED STATES BANKRUPTCY COURT
OR THE DISTRICT OF UTAH
CENTRAL DIVISION**

In re:

CYNTHIA R. HOLMES
aka Cynthia Rose Ralston
aka Cyndi Holmes

Debtor.

Bankruptcy Case No. 19-26984

Chapter 13

**NOTICE OF MOTION TO TERMINATE
AUTOMATIC STAY AND FOR IN REM
RELIEF, NOTICE OF HEARING, AND
MAILING CERTIFICATE**

Objection Deadline: 10/11/2019

Hearing Date: 10/15/2019

[Filed Electronically]

PLEASE TAKE NOTICE that Freedom Mortgage Corporation has filed with the United States Bankruptcy Court for the District of Utah a Motion to Terminate Automatic Stay and for In Rem Relief.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Freedom Mortgage Corporation has moved the court pursuant to 11 U.S.C. Section 362 for an Order Terminating the Automatic Stay and for In Rem Relief with respect to real property located at 555 North 75 West, Springville, UT 84663 so that it may exercise its rights and remedies under applicable law.

If you do not want the Court to grant relief requested in the Motion to Terminate Automatic Stay and for In Rem Relief, then:

- (1) On or before October 11, 2019, you or your lawyer must file with the Bankruptcy Court a written objection to the Motion to Terminate Automatic Stay and for In Rem Relief explaining your position at: United States Bankruptcy Court, 350 South Main Street, Room 301, Salt Lake City, Utah 84101. If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will receive it on or before October 11, 2019. You must also mail a copy of your Objection to the undersigned counsel at 376 East 400 South, Suite 300, Salt Lake City, UT 84111.
- (2) Attend the hearing on the Motion to Terminate Automatic Stay and for In Rem Relief which is set before a Judge of the above entitled Court on the **15th day of October 2019, at 10:00 o'clock AM**, at the U.S. Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84101. Failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion to Terminate Automatic Stay and for In Rem Relief and may enter an order granting that relief. In the absence of a timely objection, the undersigned counsel may and will ask the court to strike the hearing and enter an order approving the Motion

to Terminate Automatic Stay and for In Rem Relief without hearing.

DATED this 25th day of September 2019.

/s/ Brian J. Porter
Brian J. Porter
Attorney for Freedom Mortgage Corporation

MAILING CERTIFICATE

The undersigned hereby certifies that true and correct copies of the Motion to Terminate Automatic Stay and for In Rem Relief, and the foregoing Notice of Hearing were mailed by first class mail, postage prepaid, or via ECF, this 25th day of September 2019, to each of the following:

Cynthia R. Holmes
555 North 75 West
Springville, UT 84663
Debtor

United States Trustee
Via ECF

Pro Se
Via ECF
Debtors' Attorney

Lon Jenkins
Via ECF
Chapter 13 Trustee

/s/ Brian J. Porter
Brian J. Porter
Attorney for Freedom Mortgage Corporation